



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NR
F. #2020R00338

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 4, 2021

By ECF

The Honorable Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Kent Bulloch and William Young, Sr.
Criminal Docket No. 20-181 (PK)

Dear Judge Kuo:

The government submits this letter in connection with the above-captioned matter, which is currently scheduled for a status conference on January 6, 2021. The parties hereby jointly request an adjournment of that status conference until a date convenient to the Court during the week of March 8, 2021.

To date, the government has provided substantial discovery to the defendants, who are at liberty, will produce what it expects to be the final tranche of discovery materials – responsive emails obtained via judicially authorized search warrants – by the middle of January. The government has extended written plea offers to both defendants. Additionally, counsel for Mr. Young has provided material to the government relating to Mr. Young's medical condition that may be relevant to a resolution of this matter and is expected to produce additional materials to the government relating to that issue.

As such, the requested adjournment will provide an opportunity for the defendants and their counsel to review the additional discovery and to consider whether this matter may be resolved short of trial.

Accordingly, for the forgoing reasons, the parties request that the Court adjourn the status conference scheduled for January 6, 2021 until a date convenient to the Court during the week of March 8, 2021. Additionally, the parties request that the Court enter an Order excluding the time between January 6, 2021 and the date of the next scheduled status conference from Speedy Trial calculation, so as to enable the

defendants and their counsel to continue plea discussions with the government without compromising each defendant's ability to prepare for trial.

Respectfully submitted,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
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cc: Clerk of the Court (via ECF)
Defense counsel (via email and ECF)